

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INTERNATIONAL BUSINESS MACHINES CORPORATION,)	
)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 16-122-LPS-CJB
)	
GROUPON, INC.,)	
)	
Defendant.)	

NOTICE OF SERVICE

The undersigned hereby certifies that on the 10th day of March, 2017, **PRELIMINARY IDENTIFICATION OF PROPOSED TERMS, PHRASES, AND CLAUSES FOR CONSTRUCTION OF GROUPON, INC.** were served upon the following counsel of record at the address and in the manner indicated:

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Dated: March 13, 2017